

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA  
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS, et al.,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff /  
Intervening Interpleader Counter-  
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, and BW  
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA  
SERVICES, INC.,

Interpleader Defendants / Interpleader  
Counter-Plaintiffs.

**NOTICE OF FILING OF MOTION TO SEAL**

Pursuant to Local Rule 5(C), Defendant Brian Watson hereby respectfully submits this notice of filing a motion for leave to file under seal his Memorandum in Support of his Motion to Remove “Attorneys’ Eyes Only” Designation and Exhibit C to the Declaration of Jeffrey R. Hamlin in support of that Motion. Parties and non-parties may submit memoranda in support of or in opposition to the motion within seven (7) days after the filing of the motion to seal and may designate all or part of such memoranda as confidential. Any information designated as

confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the motion to seal, and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Moreover, because the material sought to be sealed has been designated as “Highly Confidential—Attorneys’ Eyes Only” only by IPI, IPI is hereby notified of its obligation to file a response to this motion complying with Local Civil Rule 5(C)(2), (3), and (4), along with a proposed order, pursuant to Local Rule 5(C).

Dated: August 12, 2022

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VA Bar No. 46932)

George R. Calhoun (*pro hac vice*)

James Trusty (*pro hac vice*)

IFRAH PLLC

1717 Pennsylvania Avenue NW, Suite 650

Washington, DC 20006

Telephone: (202) 524-4140

Facsimile: (202) 524-4141

jhamlin@ifrahlaw.com

george@ifrahlaw.com

jtrusty@ifrahlaw.com

Stanley L. Garnett (*pro hac vice*)

Amanda K. Houseal (*pro hac vice*)

Sara R. Bodner (*pro hac vice*)

Leah M. Regan-Smith (*pro hac vice*)

Neil S. Sandhu (*pro hac vice*)

Brownstein Hyatt Farber Schreck, LLP

410 17<sup>th</sup> Street, Suite 2200

Denver, CO 80202

Telephone: (303) 223-1100

Facsimile: (303) 223-1111

sgarnett@bhfs.com

ahouseal@bhfs.com

sbodner@bhfs.com

lregansmith@bhfs.com  
nsandhu@bhfs.com

*Counsel for WDC Holdings LLC, Brian  
Watson, Sterling NCP FF, LLC, Manassas  
NCP FF, LLC, NSIPI Administrative Manager,  
and BW Holdings LLC*